

# EXHIBIT A

CITATION – PERSONAL SERVICE – TRCP 99

THE STATE OF TEXAS

2019-DCL-02368-D

Sotero Cepeda § IN THE 103RD DISTRICT COURT  
VS § OF  
World Atlantic Leasing, LLC dba World Atlantic § CAMERON COUNTY, TEXAS  
Airlines

TO **World Atlantic Leasing, LLC dba World Atlantic Airlines**  
**May be served through its registered agent Tomas Romero**  
**6355 NW 36th St Suite #100**  
**Virginia Gardens FL 33166 or wherever found, GREETING:**

**NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of 20 days after the date you were served this citation and petition, a default judgment may be taken against you." TRCP. 99**

You are hereby commanded to appear by filing a written answer to **Plaintiff's Original Petition** at or before 10:00 o'clock A.M. on the Monday next after the expiration of 20 days after the date of service of this citation before the Honorable 103rd District Court of Cameron County, at the Courthouse in said County in Brownsville, Texas. Said **Plaintiff's Original Petition** was filed in said court on **April 17, 2019**, in the above entitled cause.

The file number of said suit being  
**2019-DCL-02368-D**

The style of the case is:  
**Sotero Cepeda, Jaydee Cantu, Erika Exinia, Minerva Garcia, Edgar Gonzalez, Jose Gonzalez, Jose Mancillas, Jose Munoz, Alberto Oliveira, Jr., Emmanuel Pizana, Felipe Ramirez, Dror Saar, Catalina Shull, Alejandra Silveyra, Arturo Turribiates vs. World Atlantic Leasing, LLC dba World Atlantic Airlines**

The nature of Petitioner's demand is fully shown by a true and correct copy of **Plaintiff's Original Petition** accompanying this citation and made a part hereof.

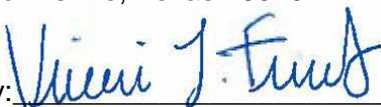
The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at Brownsville, Texas, on this the 30th day of April, 2019.

ATTORNEY:  
**LARRY W. LAWRENCE, Jr**  
**00794145**  
**956-994-0057**  
**3112 Windsor Rd Suite A234**  
**Austin TX 78703**



Eric Garza  
District Clerk of Cameron County  
974 E Harrison St.  
Brownsville, Texas 78520

By:   
**Viviana Fuentes**, Deputy Clerk

|                                          |                                                                                                                                                                                                                                                                                               |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2019-DCL-02368-D<br>103rd District Court | Sotero Cepeda,Jaydee Cantu,Erika Exinia,Minerva Garcia,Edgar Gonzalez,Jose Gonzalez,Jose Mancillas,Jose Munoz,Alberto Oliveira, Jr.,Emmanuel Pizana,Felipe Ramirez,Dror Saar,Catalina Shull,Alejandra Silveyra,Arturo Turribiates vs. World Atlantic Leasing, LLC dba World Atlantic Airlines |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## RETURN OF SERVICE

Executed when copy is delivered:

This is a true copy of the original citation, was delivered to defendant \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

NAME/ADDRESS FOR SERVICE

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\_\_\_\_\_  
County, TX

By: \_\_\_\_\_ Deputy

## OFFICERS RETURN

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_m and \_\_\_\_\_ County, Texas, by delivering to each of the within named defendants in person, a true copy of this \_\_\_\_\_ with the date of delivery endorsed thereon, together with the accompanying copy of the \_\_\_\_\_ at the following times and places, to wit:

| NAME | DATE/TIME | PLACE/COURSE/DISTANCE FROM COURTHOUSE |
|------|-----------|---------------------------------------|
|      |           |                                       |

And not executed as to the defendant(s), \_\_\_\_\_  
The diligence used in finding said defendant(s) being:

and the cause or failure to execute this process is:

and the information received as to the whereabouts of said defendant(s) being:

FEES:  
SERVING PETITION/COPY \$ \_\_\_\_\_  
TOTAL: \$ \_\_\_\_\_

\_\_\_\_\_  
County, TX

By: \_\_\_\_\_ Deputy

AFFIANT

**COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.**

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The signature is not required to be verified. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return shall be signed under penalty or perjury and contain the following statement:

"My name is \_\_\_\_\_, my date of birth is \_\_\_\_\_, my address is \_\_\_\_\_

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED in \_\_\_\_\_ County, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

ID Number/Expiration of Certification

Declarant/Authorized Process Server

FILED  
 2019-DCL-02368  
 4/17/2019 5:22 PM  
 Eric Garza  
 Cameron County District Clerk  
 By Viviana Fuentes Deputy Clerk  
 32880741

CAUSE NO. 2019-DCL-02368

|                                  |   |                                       |
|----------------------------------|---|---------------------------------------|
| SOTERO CEPEDA, JAYDEE CANTU,     | § | IN THE DISTRICT COURT                 |
| ERIKA EXINIA, MINERVA GARCIA,    | § |                                       |
| EDGAR GONZALEZ, JOSE GONZALEZ,   | § |                                       |
| JOSE MANCILLAS, JOSE MUNOZ,      | § |                                       |
| ALBERTO OLIVEIRA, JR., EMMANUEL  | § | Cameron County - 103rd District Court |
| PIZANA, FELIPE RAMIREZ,          | § |                                       |
| DROR SAAR, CATALINA SHULL,       | § |                                       |
| ALEJANDRA SILVEYRA, ARTURO       | § |                                       |
| TURRIBIATES                      | § |                                       |
| <i>Plaintiffs</i>                | § |                                       |
|                                  | § |                                       |
| VS.                              | § | _____ JUDICIAL DISTRICT               |
|                                  | § |                                       |
| WORLD ATLANTIC LEASING LLC       | § |                                       |
| Doing Business as WORLD ATLANTIC | § |                                       |
| AIRLINES                         | § |                                       |
| <i>Defendant</i>                 | § | CAMERON COUNTY, TEXAS                 |

### **PLAINTIFFS' ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, **SOTERO CEPEDA, JAYDEE CANTU, ERIKA EXINIA, MINERVA GARCIA, EDGAR GONZALEZ, JOSE GONZALEZ, JOSE MANCILLAS, JOSE MUNOZ, ALBERTO OLIVEIRA, JR., EMMANUEL PIZANA, FELIPE RAMIREZ, DROR SAAR, CATALINA SHULL, ALEJANDRA SILVEYRA and ARTURO TURRIBIATES**, complaining **WORLD ATLANTIC LEASING LLC, Doing Business as WORLD ATLANTIC AIRLINES**, and for cause of action would show:

### **I. DISCOVERY**

This is a level III discovery case as defined by the Texas Rules of Civil Procedure.

### **II. PARTIES**

Plaintiffs are all residents of Cameron County, Texas.

Defendant, World Atlantic Leasing, LLC is a Florida Limited Liability Company which does

business as World Atlantic Airlines and conducts business in Brownsville, Cameron County, Texas. Defendant may be served through its registered agent Tomas Romero, at 6355 NW 36TH ST. SUITE #100, Virginia Gardens, FL 33166 or wherever found.

### **III. JURISDICTION & VENUE**

The subject matter in controversy is within the jurisdictional limits of this court. Venue is proper because all or part of the causes of action giving rise to this lawsuit occurred in Cameron County, Texas.

### **IV. FACTS**

On April 20, 2018 Plaintiffs were passengers on board World Atlantic Flight 708 originating in Brownsville, Cameron County, Texas. The subject aircraft was a McDonald Douglas MD-83, identified by registration number N807WA. The aircraft was owned, operated and maintained by Defendant World Atlantic Leasing, LLC, doing business as World Atlantic Airlines. As Flight 708 approached the airport located in Alexandria, Louisiana the pilot(s) called in an emergency approach and reported the plane was having problems with its landing gear as it came in on Runway 14 of the airport. The plane landed hard and then reportedly traveled another 6,000 feet to the 32 end of the runway before suffering a complete collapse of the right side landing gear. None of the Plaintiffs/passengers were informed by the flight crew that an emergency landing had been declared by the pilot and thus, none were told to assume a protective crash position.

### **V. NEGLIGENCE**

At all times relevant to this suit, Defendant owned, operated, and was responsible for the upkeep, safety, and maintenance of the subject aircraft. Moreover, Defendant and its flight crew were responsible for the safety and security of the passengers on board. As such, the Defendant owed the Plaintiffs a duty of reasonable care to insure safe passage while aboard its aircraft and to

take all appropriate and prescribed emergency measures with respect to its passengers during the landing. Defendant breached the aforementioned duties to the Plaintiffs, and such breaches proximately caused the injuries, harms and losses they sustained as result of the crash.

#### **VI. REQUEST FOR DISCLOSURE**

Under Texas Rule of Civil Procedure 194, plaintiff requests that all defendants disclose, within 50 days of the service of this request, the information or material described in Rule 194.2.

#### **VII. DAMAGES**

As a result of the crash of Flight 708, Plaintiffs have suffered and will continue to suffer the following damages:

1. Pain and mental anguish in the past and future;
2. Medical expenses in the past and future;
3. Loss of wages and income in the past and future;
4. Physical impairment in the past and future;
5. Loss of Household Services in the past and future; and
6. Disfigurement in the past and future.

By reason of the above, Plaintiffs have suffered losses and damages in a sum within the jurisdictional limits of the Court and for which this lawsuit is brought. In accordance with Texas Rule of Civil Procedure 47, as amended, and with the information currently available, Plaintiffs seeks monetary relief over \$1,000,000.00.

**WHEREFORE, PREMISES CONSIDERED,** Plaintiffs asks that the Defendant be cited to appear and answer herein, and that upon a final trial of this cause, judgment be entered in favor of the Plaintiffs, pre-judgment and post-judgment interest, costs of court, and such other relief to which the Plaintiffs may be justly entitled.

**PLAINTIFFS HEREBY REQUESTS A JURY TRIAL AND TENDER THE  
APPROPRIATE FEE.**

Respectfully submitted,

LAWRENCE LAW FIRM  
3112 Windsor Rd., Suite A234  
Austin, Texas 78703  
(956) 994-0057  
(800) 507-4142 - FAX  
[Lawrencefirm@gmail.com](mailto:Lawrencefirm@gmail.com)

By:



LARRY W. LAWRENCE, JR.  
State Bar No. 00794145  
MICHAEL A. LAWRENCE  
State Bar No. 24055826  
CELESTE GUERRA  
State Bar No. 00795395

ATTORNEYS FOR PLAINTIFF